

Sanga, Ravi

From: Sanga, Ravi
Sent: Wednesday, June 15, 2016 10:49 AM
To: Dyer, Miles; 'Ernst, William D'
Cc: 'Tom Colligan'; 'dbalbiani@pesenv.com'; 'Dee Gardner'; 'Paul Grant'; 'dougk@epi-wa.com'
Subject: JFOS SWPPP

Miles and Will – I coordinated with Ecology regarding the Jorgensen SWPPP that you sent to EPA for the management of shored excavation dewatering water. Based on this coordination, Jorgensen and Boeing will have to submit a new SWPPP that is specific to the construction of the Shored Excavation Area for the JFOS Time Critical Removal.

The Jorgensen SWPPP you sent me is the SWPPP Jorgensen uses to comply with their Industrial General Stormwater Permit. That permit actually authorizes the discharge of industrial stormwater to waters of the state subject to conditions. It is not relevant to the current JFOS construction project. If the project results in discharge of water to waters of the US (i.e., the Duwamish) then in order to ensure substantive compliance with Clean Water Act Section 402 requirements for discharges from construction activities, Jorgensen and Boeing will need to ensure they are substantively following requirements spelled out in Washington State's Construction General Stormwater Permit (<http://www.ecy.wa.gov/programs/wq/stormwater/construction/>).

This includes the SWPPP documentation that is specific to the project area (excavation, staging, etc.) and project conditions (dewatering water management, including monitoring) and addresses all 13 elements of a construction SWPPP.

Rather than retaining the dewatering water and discharging it to the river. EPA is requiring Jorgensen and Boeing to discharge treated wastewater to the sanitary sewer under an appropriate King County discharge authorization (<http://www.kingcounty.gov/services/environment/wastewater/industrial-waste/business/faq.aspx>) permit. If Jorgensen and Boeing are not able to discharge to sanitary, then further discussion with EPA and the WA Department of Ecology will need to occur in order to discuss whether and under what conditions this discharge could go to the river. Ecology places additional requirements (including treatment and monitoring requirements) on construction-related discharges from contaminated sites. Jorgensen will need to coordinate with Ecology in order to evaluate the project proponent's proposal for the disposal of dewatering water.

Let me know if we need to have a conversation about with Ecology or have a conversation about this ourselves.

Thanks

Ravi